

ALASKA COMMUNICATIONS

PETITION FOR CLARIFICATION OR, IN THE ALTERNATIVE, PETITION FOR LIMITED  
WAIVER OF THE REQUIREMENT TO IDENTIFY BY LATITUDE AND LONGITUDE THE  
LOCATIONS IN WHICH ALASKA COMMUNICATIONS DEPLOYED BROADBAND TO MEET  
THE REQUIREMENTS OF CONNECT AMERICA FUND ("CAF") PHASE I

WC DOCKET No. 10-90

DECLARATION OF STAN MASNERI

I, Stan Masneri, make the following declaration in support of the above-captioned  
Petition of Alaska Communications:

1. I am District Operations Manager - Southwest for Alaska Communications Systems Group, Inc. ("Alaska Communications"). I have 17 years' experience in network deployment and maintenance in Alaska. I work closely with Alaska Communications network engineers and field technicians, including in the planning and execution of the broadband deployment undertaken by Alaska Communications using CAF Phase I incremental support.
2. In 2012, when Alaska Communications accepted the first round of incremental CAF Phase I support, we identified the wire center and census block of each location where we deployed broadband supported by CAF Phase I. We timely completed deployment. We subsequently learned that the FCC wanted latitude and longitude coordinates for each of these locations. We do not yet have this "geocode" information for 2,063 of our CAF Phase I, Round 1 locations, most of which are in remote communities such as Kodiak Island, the Kenai peninsula, and Delta Junction.

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3. For the second round of CAF Phase I incremental support, Alaska Communications accepted support only for 316 locations in the community of Nenana. Again, we timely completed deployment, but we do not have location information by geocode, only by census block, wire center and customer address.

4. Where geocodes are not available from any state or borough parcel map, a technician will have to visit each location with a hand-held device to obtain the necessary geocode information. Some of these locations have no street address (they are on unnamed roads) and are difficult to locate in the best of conditions. I believe that 524 of the locations are not accessible via road at all, meaning that technicians only can reach them via a charter flight or by snow-machine or boat. The other 1,855 locations are technically accessible by road, but they are located in such remote areas that access is difficult and even dangerous most of the year. Many on-road locations such as Homer and the Kenai peninsula are rendered inaccessible due to storms, heavy winter precipitation, and seasonal residence. Under the best conditions, it is hazardous to send an employee to most of Alaska's isolated areas. This is true in locations such as Delta Junction, Kodiak island or Nenana for much of the year, due to sub-zero temperatures, impassable roads, winds as high as 80 mph, ice, snow, fog and unpredictable weather of all kinds. Technicians often are unable to perform scheduled maintenance work in these locations because weather prevents them from flying in; and once there, they frequently are prevented from flying out until weather conditions improve. This greatly adds to the cost of the visit. In short, there are many days in the year when conditions prevent standard maintenance visits to these locations, let alone visits solely for the purpose of obtaining geocode information. The normal construction season begins in

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May or June and runs only until August or September, depending on weather conditions. Unless a field visit is necessary to repair critical infrastructure, Alaska Communications will not send technicians into the field in dangerous conditions. It makes no sense to do so when such work will likely be impossible to complete in a reasonable time frame.

5. Sending a field technician to these locations is costly. We estimate that gathering the missing geocodes for CAF Phase I locations will cost upwards of \$73,000 if we have to undertake field visits just for this purpose. We have a limited budget and would much prefer to gather the remaining geocodes as we visit these locations in the ordinary course of business, when we send a technician into the field for installation or maintenance work. We expect to visit many of these locations in the 2017 construction season. I estimate we can get to all of the 2,379 locations in two construction seasons, by Autumn 2018.

The foregoing is true and complete as of the date hereof, to the best of my information, knowledge and belief.

Date: March 10, 2017

